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Ref:  
58038-0043

February 9, 2007

**BY OVERNIGHT DELIVERY**

Kim Muratore  
Case Developer (SFD-7-B)  
United States Environmental Protection Agency  
Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

Re: Our client: CalMat Co. dba Vulcan Materials Company, Western Division  
("CalMat")  
March 28, 2006 General Notice Letter and CERCLA § 104(e) Information  
Request

Dear Ms. Muratore:

Our office represents CalMat Co. vba Vulcan Materials Company, Western Division ("CalMat"). We enclose supplemental responses to the EPA's most recent CERCLA § 104(e) Information Request. We continue to compile the Appendix of supporting materials and will forward same to EPA as quickly as possible.

In an effort to assist the EPA in evaluating the enclosed responses, Consolidated Rock Products Co. ("Consolidated"), Conrock Co. ("Conrock") and CalMat Co. ("CalMat") are effectively the same entity. Founded in the 1920s, Consolidated later became Conrock, which subsequently changed its name to CalMat in the 1980s.

Please contact our office with questions or comments.

Very truly yours,



KENNETH A. EHRLICH,  
a Professional Corporation of  
Jeffer, Mangels, Butler & Marmaro LLP

KAE/pf  
Enclosures

## SUPPLEMENTAL QUESTIONS

1. Provide the name and mailing address of the Company's parent entity referenced in the Company's 104(e) response dated May 18, 2006.

***Response:***

Vulcan Materials Company  
1200 Urban Center Drive  
Birmingham, AL 35242

See attached Exhibit 121.

2. In the Company's 104(e) response dated May 18, 2006, California Materials Company is shown as a former owner of the properties at 9361 Glenoaks Blvd. and 9228 Tujunga Avenue. Describe the corporate affiliation, if any, between CalMat Co. and California Materials Company. Provide copies of all documents evidencing such affiliation(s), including, but not limited to, merger agreements, asset or stock purchase agreements, joint venture agreements and fictitious business name filings.

***Response:***

There are at least 2 separate corporations listed with the California Secretary of State as using, at different times, the name "California Materials Company," Corporation Nos. C0671493 and C0171169.

Corporation No. C0671493 was incorporated on December 29, 1972 and dissolved in 1999. This corporation was a subsidiary of Conrock Co./CalMat Co.

Corporation No. C0171169 was incorporated in 1937, changed its name to Bancroft Associates in 1961, and was dissolved in 1962, according to the Secretary of State's records.

A Certificate of Ownership and Merger (Exhibit 123) indicates merger between "California Materials Company," a wholly owned subsidiary, and Conrock Co., dated December 20, 1972, and was filed with the Secretary of State on December 29, 1972.

3. The Company's May 18, 2006 104(e) response also shows California Portland Cement Company as a former owner of the properties at 9361 Glenoaks Blvd. and 9228 Tujunga Avenue. The Corporation Grant Deed recorded December 23, 1987 shows California Portland Cement Company as a wholly-owned subsidiary of the Company. Describe the current and historical corporate affiliation between CalMat Co. and California Portland Cement Company. Provide copies of all documents evidencing such affiliation(s), including, but not limited to, merger agreements, asset or stock purchase agreements, joint venture agreements and fictitious business name filings.

***Response:***

CalMat Co. acquired California Portland Cement Company (CPC) on June 27, 1984 and maintained CPC as a subsidiary until it sold CPC in 1990. See attached Exhibit 124.

4. The Corporation Grant Deed recorded December 23, 1987 shows California Portland Cement Company transferring to CalMat Land Co. four parcels of property. Identify the current locations of the parcels of property associated with APN 2408-036-001 and APN 2538-022-020, both by street address and on a map.

***Response:***

APN 2538-022-020 is not associated with a postal address. See attached Exhibit 2, including map.

According to available information from the Los Angeles County Assessor's office, there is no record of APN 2408-036-001. We believe this parcel reference refers to the property located at 8946 Bradley Avenue, Sun Valley, CA 91352. CalMat Co. sold this property in June 1995. See attached Exhibits 1-2.

5. Information obtained by EPA indicates that the Company owns and operates property associated with the CalMat Class III Disposal Site (also referred to as the CalMat Inert landfill) at 9436 Glenoaks Blvd. Sun Valley, California. If so, provide the dates the Company, its predecessors, subsidiaries and/or affiliates have owned or operated this landfill, and describe the types of operations conducted and types of waste accepted.

***Response:***

Historic Operations:

The Company believes that CPC had been the owner of three parcels of this property since approximately in the 1940s, until Conrock purchased it in 1979. See attached Exhibits 44-45. The company also believes that mining was conducted on the property until approximately 1983, when landfill use commenced in addition to the existing extraction operations. It is believed that extraction continued past 1991.

Waste Characteristics:

The CalMat inert waste landfill receives uncontaminated soils, rock, brick, clay tile, concrete block, concrete, and asphalt. No liquid wastes are received at the site (Zeller, personal communication, 2007).

6. Information obtained by the EPA indicates that the Company may have formerly owned and/or operated property associated with the Penrose Dump/Penrose Landfill (also referred to as the Penrose Pit or the Penrose Sanitary Landfill) located at approximately 8145-8300 Tujunga Avenue., Sun Valley, California. If so provide the dates the Company, its predecessors, subsidiaries and/or affiliates owned or operated this landfill,

identify the parcels of property at which this landfill operated, the acreage of the landfill, and describe the types of operations conducted and types of waste accepted.

***Response:***

Conrock Co. owned the 70.69 acre property, identified as APN 2311-002-001 and 2311-002-002, until 1974. See attached Exhibits 81-82, 84. In or about March 1974, Conrock Co. sold 24 acres of the property to Los Angeles By-Product Co. for landfill use. See attached Exhibits 82-83.

During the Company's ownership of the property, it was largely operated by Blue Diamond Co. for mining and excavating and by Los Angeles By-Products, Co., for landfill use. Conrock terminated its lease with Blue Diamond Co. in 1967, and had been leasing portions of the site to Los Angeles By-Products Co. at least since 1972. See attached Exhibit 83.

We believe that inert construction debris was accepted at this site.

7. Information obtained by EPA indicates that the Company also may have formerly owned and/or operated property associated with the (a) the Branford Landfill located at or near 12456 Branford Street, Sun Valley, California, and (b) the Louis Visco landfill located at or near 9050 and 9116 Bradley Ave. Sun Valley, California. If so, provide the dates the Company, its predecessors, subsidiaries and/or affiliates owned or operated the landfills referenced above, identify the parcels of property at which each landfill operated, the acreage of each landfill, and describe the types of operations conducted and types of waste accepted at each landfill.

***Response:***

(a) Branford Landfill, 12456 Branford Street, Sun Valley, California

Historical Operations and Ownership Information:

The Company never used the 12.53 acre property, identified as APN 2629-001-001, for landfill purposes. The Company's records indicate that a portion of the 12.53 acres was used by several independent parties, including Byers Tree Firewood Service. See attached Exhibits 9, 10. In 1999, this 12.53 acre site was sold to Sunquest Development, LLC, an unaffiliated company. See attached Exhibits 12-15.

Prior to the 1940's, the Company used property adjacent to the 12.53 acres for mining operations. In the 1940's, the City of Los Angeles (City) acquired title to this site for landfill use to an unknown time period (Personal communication, George Crosby, 2007; See also Exhibit 15). Following the City's use, the City attempted to convey the site back to the Company. The Company disclaimed and challenged the conveyance and never reacquired title to same. See attached Exhibit 11. The Company believes that the City sold some or all of the property adjacent to the 12.53 acres to Sunquest in 2001.

Waste Characteristics:

The Company has no information regarding the types of waste accepted at this site.

(b) Louis Visco Landfill, 8960 Bradley Ave., Sun Valley, California

Historical Operations and Ownership Information:

Prior to CalMat ownership, it is believed that the approximate 5.5 acre Louis Visco Landfill, identified as APN 2408-036-048, was operated by an unaffiliated company owned by Louis Visco. See attached Exhibits 6, 8. The property was also referred to as Bradley Landfill East (personal communication, George Cosby, 2007). CPC owned the property and, in 1956, it appears to have been leased to A-1 Auto Wrecking, Inc., for auto dismantling use. See attached Exhibit 3. It is unknown if the entire site was used for auto dismantling purposes from the 1950's to the 1990's. It is unclear as to how CalMat Co. acquired ownership of the property. In 1994, CalMat Co. leased the property to Crown Disposal Co., Inc. for storage use until 1998. See attached Exhibits 4-5. In 1995, CalMat Co. sold a portion of the property (now known as the Lebata site) located at 8946 Bradley Avenue to an unrelated third-party.

A review of aerial photographs reveals much of the following information (see Exhibit 7):

1929 - No mining activities occurred at the site. The site is vacant and probably was used as open range land for cattle.

1937 – The site was used for sand and gravel mining.

1939 - Mining activities at the site appear to have ceased. Between 1939 and 1952, the open pit on the site remained open and appeared to be used as a silt pond for the aggregate processing plant located on the adjacent parcel to the northwest (Gregg Pit).

1952 - Backfilling of the open pit on the site began and continued through 1956.

1956 - The open pit on the site was completely filled and the site appeared vacant.

Waste Characteristics:

We believe that, during landfill use, the site accepted various non-hazardous solid wastes, such as rock, concrete, metal, and wood debris.

8. Environmental Data Resources (EDR) reports dated May 2006 and supplied by the Company in its 104(e) response suggest that the Company or its affiliated entities have owned and/or operated additional facilities in the San Fernando Valley/North Hollywood area. Provide a complete list of all facilities in the San Fernando Valley/North Hollywood area which have been owned and/or operated by the Company, its predecessors, subsidiaries and/or affiliates.

***Response:***

Other than the CalMat Inert landfill and Louis Visco Landfill described above, and the facilities at 7361 Laurel Canyon Blvd., 9361 Glenoaks Blvd., and 9228 Tujunga Avenue, the Company or its predecessors owned or operated the following facilities: Penrose Pit (APN 2311-002-001 and 2311-002-002), Tuxford Pit (APNS 2632-011-010, 2632-011-011, 2632-011-012), Sun Valley Plant, Bradley landfill, CalMat Pit (APN 2538-011-013, 2538-011-014, 2538-011-018, and 2538-011-019), Sheldon Pit, and Boulevard Pit.

9. In its 104(e) response, the Company identifies several individuals as current or former employees of Valley Reclamation Company, and includes correspondence from the California Waste Management Board to Valley Reclamation Company at CalMat Co.'s corporate address, 3200 San Fernando Road. Describe the corporate affiliation, if any, between CalMat Co. and Valley Reclamation Company and provide copies of all documents evidencing such affiliation(s), including, but not limited to, merger agreements, asset or stock purchase agreements, joint venture agreements and fictitious business name filings. If a corporate or other affiliation existed, state whether Valley Reclamation Company was the operator of any landfills or other facilities in San Fernando Valley/North Hollywood area, and identify the name, location and dates of operation of each such landfill or other facility.

***Response:***

The Company is unsure of the corporate history of Valley Reclamation Company (VRC) prior to approximately 1980. See attached Exhibits 85-88, 90. By 1980, it appears that VRC was a wholly owned subsidiary of Conrock Co. As a result of the 1984 transaction in which Conrock Co. changed its name to CalMat Co., VRC became a subsidiary of CalMat Co.

VRC leased and operated a portion of the Bradley Landfill site, located at 9227 Tujunga Ave., for landfill use. The Company is unsure when VRC began leasing and/or operating a landfill at the Bradley Landfill site. See attached Exhibits 89.

In June 22, 1979, Conrock Co. put the property in trust for City of Los Angeles. See attached Exhibit 90. It is unknown if this transaction altered operations at the site.

In December 1986, CalMat sold VRC to Waste Management, Inc. As part of this transaction, CalMat and VRC entered an Operating License Agreement for VRC to be the exclusive operator on the Bradley Landfill site. See attached Exhibit 96. Title to the property was conveyed to VRC from CalMat Co. on December 31, 1986. See attached Exhibits 97-100, 102-104. At or around this same time, CalMat Co. announced in it would sell all of its outstanding stock of VRC to Waste Management Inc., and VRC would purchase Parcels 1, 2, and 3 of the VRC landfill property from CalMat Co. See attached Exhibits 91-92, 97-100. Waste Management Inc. completed the acquisition of VRC in or about 1987. See attached Exhibits 93-95, 101.

10. The Company's 104(e) response provides documentation which shows that "Conrock" leased the property at 7361 Laurel Canyon Blvd. to Los Angeles By-Products Co., who operated it as a Class II landfill from 1962-1975. However, your response also states that

“Conrock” was the operator of this property as of April 1972. Please (a) state whether “Conrock” refers to Conrock Co., a former name of CalMat Co., and (b) explain the apparent discrepancy in which entities were operating at the property during the time period 1962 to 1975. Clearly explain whether CalMat Co. or any of its predecessors operated a landfill at this location and provide a timeline of the landfill’s operators.

***Response:***

(a) “Conrock” refers to Conrock Co., a former name of CalMat Co.

(b) From 1962 to 1975, Conrock Co. owned the Laurel Canyon Blvd. Property and leased the site to Los Angeles By-Products, Co., a tenant. See attached Exhibits 49-52. The property operated under a 10-year Zone Variance granted to Consolidated Rock Products Co. for landfill use from 1962 to 1972. See attached Exhibit 52. Only non-hazardous solid waste and inert waste were accepted in the landfill; no liquid or hazardous wastes were accepted. It appears that the landfill was officially closed in 1975.

11. In the Company’s 104(e) response, it states that automobiles first began to appear at the 9228 Tujunga Ave. facility in 1989 and provides a copy of a 1993 lease agreement showing Pick Your Part Auto Wrecking (“Pick Your Part”) as the lessee at this property. Information supplied to EPA indicates that Pick Your Part began operating at 9228 Tujunga Avenue in approximately 1981. State whether Pick Your Part or any of its predecessors were operating at this property at the time the property was purchased by CalMat Land Co. in 1987. Identify all other operators of this property prior to 1993 and describe the types of operations conducted.

***Response:***

Pick Your Part Auto Wrecking was operating on the Tujunga Avenue property (Exhibit 43) in 1987.

California Portland Cement Company acquired the property in early 1960s. See attached Exhibits 106-107. CPC leased the property to tenant Sun Valley Pick Your Part Auto Wrecking for wrecked auto salvage, storage, and dismantling uses beginning in April 1979, and amended the lease in 1981 to enlarge the leased area. Subsequent Pick Your Part leases include July 1982 to March 31, 1983. See attached Exhibit 112.

Other suspected operators of this property prior to 1993 include A-1 Scrap, Inc. (Exhibits 109, 114, 116), Agop Berghoudian (Exhibit 114), Champion Auto Parts (Exhibit 115), Crossroads Chevrolet (Exhibit 115), John D. Gregg and Lucela C. Gregg (Exhibit 105), EZ Auto (Exhibit 115), M&N Auto Dismantlers (Exhibit 115), Paul Psik (Exhibits 111, 113, 114), Pick Your Part Auto Wrecking (Exhibit 112, 117), and Insurance Salvage Service (Exhibit 108, 110).

12. In the Company’s 104(e) response, it states that beginning in 1965, automobiles were stored at the 9361 Glenoaks Blvd. facility, and that auto dismantling operations expanded through the 1970’s until the property was almost completely filled with automobiles as of 1982 and remained so at least through 2002. Identify all operators at this facility from the

time period that the Gregg Pit/Bentz dump closed in 1966 until the Company sold this property in 1988.

***Response:***

The following suspected operators of this property (Exhibit 43) from 1966 to 1988 include:

A-1 Scrap Inc. (tenant; Exhibit 38), Aaron Auto Wrecking (tenant; Exhibits 38, 40), Arutyun Aladjian and Gevork Avakian (tenant; Exhibit 28), All Auto Parts, Inc. (tenant; Exhibits 24, 38), Gary Avakian and Avedis Berghoudian/Save-On Auto Parts and Salvage Inc. (tenant; Exhibits 31, 35), Cecil Cushen (tenant; Exhibit 40), Century Auto Salvage (tenant; Exhibit 38), Crossroads Chevrolet (tenant; Exhibit 38), Crown Disposal Co. (subtenant; Exhibit 33), Elite Auto Parts Company (tenant; Exhibit 34), EZ Auto Sales and Auto Parts (tenant; Exhibit 38), Hagop A. Hairabedian (subtenant; Exhibit 27), Insurance Salvage Service (tenant; Exhibits 18, 22, 23, 25), Pacific Coast Roof Corporation (tenant; Exhibits 16, 38, 39), Nick Pavitch (tenant/subtenant; Exhibits 26, 27, 33), Pick Your Part Auto Wrecking (tenant; Exhibits 36, 37), Sam's Auto Salvage and Auto Wrecking (tenant; Exhibit 32), Martin Sklar/Sun Valley Wrecking (tenant; Exhibits 17, 19, 21, 26, 29, 38), and Sun Valley Auto Parts (tenant; Exhibit 20).

13. To the best of the Company's knowledge, identify all former operators of the landfill commonly referred to as the Gregg Pit/Bentz Dump, including the last known contact information and status of each operator.

***Response:***

The Company understands that the Gregg Pit/Bentz Dump encompassed the Glenoaks facility at 9361 Glenoaks Blvd. The Company is unsure if the 9268 Tujunga Blvd. facility also comprised the Gregg Pit/Bentz Dump.

The Company believes that John D. Gregg and Lucela C. Gregg (owners prior to 1949; Exhibit 105) operated a landfill at the Gregg Pit/Bentz Dump. The Company has been unable to determine if others also operated this site as a landfill.

**ADDITIONAL RESPONSES TO PREVIOUS QUESTIONS**

8. For each business structure under which the Company has existed or operated at each of the facilities at 7361 Laurel Canyon Blvd., North Hollywood, California (the "Laurel Canyon Facility"), 9361 Glenoaks Blvd., Sun Valley, California (the "Glenoaks Blvd. Facility") and 9228 Tujunga Avenue, Sun Valley, California (the "Tujunga Avenue Facility"), collectively referred to as "the Facilities," since 1929, provide the corresponding dates that the Company existed or operated under that business structure, the name(s) it used, and the addresses at which it operated or was otherwise located.

***Response:***



<b>FACILITY</b>	<b>COMPANY ENTITY</b>	<b>DATES OF EXISTENCE/ OPERATION AT FACILITY</b>	<b>ADDRESS OF FACILITY</b>
Laurel Canyon Facility ("Hewitt")	Consumers Rock and Gravel Co., a wholly owned subsidiary of Consolidated Rock Products, Co., purchased the property in 1929. See attached Exhibits 46-48. Consolidated Rock Products, Co. was renamed Conrock Co. in 1972, and Conrock Co. was renamed CalMat Co. in 1984. See attached Exhibit 122.	Company ownership of property from approximately 1929 to present, with operations conducted by tenants.	7361 Laurel Canyon Blvd.
Glenoaks Facility	CalMat purchased the property in December 1987 and sold it in September 1988. See Exhibits 125, 38.	CalMat purchased the property in December 1987, with operations conducted by tenants, and sold the property to Pick Your Part Auto Wrecking in September 1988.	9361 Glenoaks Blvd.
Tujunga Facility	CalMat acquired the property in December 1987 and sold the property in 2001. See Exhibits 125, 118-120.	CalMat acquired the property in December 1987 and sold to Pick Your Part Auto Wrecking in December 2001.	9228 Tujunga Avenue
Bradley Landfill	Conrock Co. leased the property to VRC	Conrock owned the property	9227 Tujunga Ave.

FACILITY	COMPANY ENTITY	DATES OF EXISTENCE/ OPERATION AT FACILITY	ADDRESS OF FACILITY
	in or about 1972. See Exhibit 89. In or about 1983, the Company acquired an adjacent approximately 60 acres from Livingston-Graham Co. that also became part of the Bradley Landfill. In December 1986, CalMat Co. sold the property to VRC, which was concurrently acquired by Waste Management in 1986. See Exhibits 94-95, 97-104.	prior to 1972 beginning at an unknown date, with operations conducted by its subsidiary tenant, and sold the property in 1986.	

In the Company's 104(e) response dated May 18, 2006, the Company indicates that Consumers Rock and Gravel Company is a predecessor in interest to CalMat Co. The response also shows that a company called Consumers Rock & Gravel Co. is a former owner of the property at 7361 Laurel Canyon Blvd. State whether these refer to the same company and describe the corporate affiliation between CalMat Co. and Consumer Rock & Gravel Co. Provide copies of all documents evidencing such affiliation(s), including, but not limited to, merger agreements, asset or stock purchase agreements, joint venture agreements and fictitious business name filings. In addition, indicate the business structure(s) of Consumer Rock and Gravel Company (and/or Consumers Rock & Gravel Co.) from its formation to the present, and the dates the company operated under each business structure.

***Response:***

Consumer Rock and Gravel Company and Consumer Rock and Gravel Co. are the same entity.

Consumers Rock & Gravel Company, Inc. was a wholly owned subsidiary of Consolidated Rock Products Co. In April 1972, Consolidated Rock Products Co. was

renamed Conrock Co. See attached Exhibit 122. Conrock Co. changed its business name to CalMat Co. in 1984. See attached Exhibit 122.

15. For any period of time in which the Company, under any of its current or former business structures, owned any of the Facilities, provide the names, addresses and phone numbers of any tenants or lessees. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to any other operators at the \ Facilities.

***Response:***

<b>FACILITY</b>	<b>SUSPECTED TENANT NAME</b>	<b>LAST KNOWN TENANT CONTACT INFORMATION</b>
Laurel Canyon Facility ("Hewitt")	Absolute Towing (Exhibit 73)	Unknown
	Allstate Insurance Company (Exhibits 70, 71)	Unknown
	Desmond Studio Production Services (Exhibits 56, 61, 62, 65, 67-69, 74)	Unknown
	Don Pomerantz (Exhibit 63)	Unknown
	Insurance Auto Auctions (Exhibits 66, 72)	Unknown
	L.A. Auto Salvage, Inc. (Exhibits 58, 59, 60, 64)	Unknown
	Laurel Canyon Holdings (Exhibits 75-79)	Unknown
	Livingston-Graham, Inc (Exhibit 53)	Unknown
	Los Angeles By-Products, Co. (Exhibits 49-52)	Unknown
	J.S.J. Equipment Rentals (Exhibit 54)	Unknown
	Rent-a-Piece, Inc. (Exhibit 57)	Unknown

<b>FACILITY</b>	<b>SUSPECTED TENANT NAME</b>	<b>LAST KNOWN TENANT CONTACT INFORMATION</b>
	United Road Services (Exhibit 73)	Unknown
	Wimsatt Concrete Inc. (Exhibit 55)	Unknown
Glenoaks Facility	A-1 Scrap, Inc. (Exhibit 38)	Unknown
	EZ Auto Sales and Auto Parts (Exhibit 38)	Unknown
	Pacific Roof Company (Exhibits 16, 38, 39)	Unknown
	Pick Your Part Auto Wrecking (Exhibits 36, 37)	Unknown
	Martin Sklar/Sun Valley Auto Wrecking (Exhibits 17, 19, 21, 26, 29, 38)	Unknown
Tujunga Facility	Agop Berghoudian (Exhibit 114)	Unknown
	Champion Auto Parts (Exhibit 115)	
	Paul Psik (Exhibits 111, 113, 114)	Unknown
	EZ Auto (Exhibit 115)	
	M&N Auto Dismantlers (Exhibit 115)	
	Pick Your Part Auto Wrecking (Exhibits 112, 117)	Unknown
	Insurance Salvage Services (Exhibits 108, 110)	Unknown

20. Describe the size of each of the Facilities, the approximate number of people employed by the Company at each of the Facilities, and the product(s) manufactured or services

performed by the Company at each of the Facilities. Describe any significant change in Facilities' sizes, the number of employees, or the products manufactured over time.

***Response:***

<b>FACILITY</b>	<b>FACILITY SIZE</b>	<b>NUMBER OF COMPANY EMPLOYEES</b>	<b>COMPANY SERVICES PERFORMED</b>
Laurel Canyon Facility ("Hewitt")	59 acres	Unknown, No significant changes known.	The Company conducted aggregate mining operations on the property and leased the property to landfill operator/tenant Los Angeles By-Products, Co., until approximately 1975 (Exhibits 49-52) and has leased to various auto and storage tenants after landfill operations ceased (Exhibits 54-79).
Glenoaks Facility	44.53 acres	Unknown, No significant changes known.	The Company leased the property to various auto wrecking/dismantling tenants until it sold the property to Pick Your Part Auto Wrecking in September 1988. See attached Exhibits 38, 41-42.
Tujunga Facility	8.76 acres	Unknown, No significant changes known.	The Company leased the property to various auto wrecking/dismantling tenants until it sold the property to Pick Your Part Auto Wrecking in December 2001. See

			attached Exhibits 118-120.
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In its 104(e) response dated May 18, 2006, the Company states that its ownership of the Laurel Canyon facility began with the acquisition of the property by Consumer Rock and Gravel Company in October 1923, but provides little information about the operations conducted. Provide complete information about the types of operations conducted at the Laurel Canyon facility by the Company, its predecessors, subsidiaries and/or affiliates from 1923 to the present. Describe the types of operations conducted, and provide a timeline of operations and the entities which operated during those time periods. Also indicate whether the Company or any of its predecessors, subsidiaries or affiliates continued operations at the Laurel Canyon facility after the Master Lease Agreement between CalMat Properties Co. and Laurel Canyon Holding, LLC was executed in December 2001.

***Response:***

History of Laurel Canyon Facility:

Consumers Rock and Gravel Co. purchased what appears to be the property from Thomas M. Todd on October 11, 1923. See attached Exhibits 46-47. Consumers Rock and Gravel Co. acquired another portion of what appears to be the property on in 1923 from Fred W. Heatherly. See attached Exhibit 48. Sand and aggregate mining operations began on the property approximately in 1923.

From approximately 1962 to 1975, Conrock Co. owned the Laurel Canyon Blvd. Property and leased the site to Los Angeles By-Products, Co., a tenant. See attached Exhibits 49-52. The property operated under a 10-year Zone Variance granted to Consolidated Rock Products Co. for landfill use from 1962 to 1972. See attached Exhibit 52. Only non-hazardous solid waste and inert waste were accepted in the landfill; no liquid or hazardous wastes were accepted. The landfill was officially closed in 1975. Since landfill operations ceased, the site has been leased by the Company to tenants for predominately auto and mini-storage businesses.

Summary of Laurel Canyon Facility Operations:

SUSPECTED OPERATOR/TENANT	APPROXIMATE OCCUPANCY PERIOD	TYPE OF OPERATIONS
Absolute Towing (Exhibit 73)	1999-2004	Towing service.
Allstate Insurance Company (Exhibits 70, 71)	1997-Unknown	Unknown.

<b>SUSPECTED OPERATOR/TENANT</b>	<b>APPROXIMATE OCCUPANCY PERIOD</b>	<b>TYPE OF OPERATIONS</b>
Desmond Studio Production Services (Exhibits 56, 61, 62, 65, 67-69, 74)	1987-2001	Parking; storage of vehicles and movie studio equipment.
Don Pomerantz (Exhibit 63)	1993-Unknown	Unknown.
Insurance Auto Auctions (Exhibits 66, 72)	1999-2004	Storage.
L.A. Auto Salvage, Inc. (Exhibits 58, 59, 60, 64)	1987-1994	Salvage and storage
Laurel Canyon Holdings (Exhibits 75-79)	Lease for 2001-2026	Unknown.
Livingston-Graham, Inc (Exhibit 53)	1983-Unknown	Unknown.
Los Angeles By-Products, Co. (Exhibits 49-52)	Approximately 1962-1975	Solid waste landfill use.
J.S.J. Equipment Rentals (Exhibit 54)	1986-Unknown	Unknown.
Rent-a-Piece, Inc. (Exhibit 57)	1987-Unknown	Unknown.
United Road Services (Exhibit 73)	1999-2004	Unknown.
Wimsatt Concrete Inc. (Exhibit 55)	1987-Unknown	Unknown.

In its 104(e) response dated May 18, 2006, the Company states that CalMat Land Company owned and operated the property at the Glenoaks Blvd. facility from December 1, 1987 until September 12, 1988, but provides little information about the operations conducted and no copies of the requested leases. Provide complete information about the types of operations conducted at the Glenoaks Blvd. facility by the Company, its predecessors, subsidiaries and/or affiliates. Also provide copies of all leases in effect during the time period this facility was owned by the Company, its predecessors, subsidiaries and/or affiliates.

In its 104(e) response dated May 18, 2006, the Company states that the property at the Tujunga Avenue facility was owned and operated by CalMat Co. and/or its predecessors from December 1, 1987 until April 1, 2002. The Company provides little information about the operations conducted at the Tujunga Avenue facility and does not provide copies of all leases for the time period. Provide complete information about the types of operations conducted at the Tujunga Avenue facility by the Company, its predecessors, subsidiaries and/or affiliates. Also provide copies of all leases in effect at the facility prior to January 1993.

***Responses:***

Summary of Glenoaks Facility Operations:

<b>SUSPECTED OPERATOR/TENANT</b>	<b>APPROXIMATE TENANCY PERIOD</b>	<b>TYPE OF OPERATIONS</b>
<b>Operators/ tenants on property during CalMat's ownership:</b>		
A-1 Scrap, Inc. (Exhibit 38)	Unknown	Unknown.
Aaron Auto Wrecking (Exhibits 38, 40)	Unknown	Auto salvage use.
All Auto Parts (Exhibits 24, 38)	Unknown	Auto salvage use.
Century Auto Salvage (Exhibit 38)	Unknown	Auto salvage use.
Crossroads Chevrolet Inc. (Exhibit 38)	Unknown	Unknown.
EZ Auto Sales and Auto Parts (Exhibit 38)	Unknown	Storage.
Pacific Roof Company Exhibits 16, 38, 39)	1977-Unknown	Unknown.
Pick Your Part Auto Wrecking (Exhibits 36, 37)	Until 1987 (then became property owner)	Auto salvage use.
Martin Sklar/Sun Valley Auto Wrecking (Exhibits 17, 19, 21, 26, 29, 38)	1978- Unknown	Auto salvage use.



<b>SUSPECTED OPERATOR/TENANT</b>	<b>APPROXIMATE TENANCY PERIOD</b>	<b>TYPE OF OPERATIONS</b>
<b>Suspected operators/tenants on property prior to CalMat's ownership:</b>		
All Auto Parts (Exhibits 24, 38)	1981-Unknown	Auto salvage use.
Cecil Cushen (Exhibit 40)	1976-1981	Unknown.
Elite Auto Parts Company (Exhibit 34)	1984-Unknown	Auto salvage use.
Gary Avakian and Avedis Berghoudian / Save-On Auto Parts and Salvage, Inc. (Exhibits 31, 35)	1982-1987	Auto salvage use.
Insurance Salvage Services (Exhibits 18, 22, 23, 25)	1979-Unknown	Unknown.
Nick Pavitch (Exhibits 26, 27, 33)	1983-1990	Unknown.
Sam's Auto Salvage and Auto Wrecking (Exhibit 32)	1985-1989	Auto salvage use.
Sun Valley Auto Parts (Exhibit 20)	1980-1985	Auto salvage use.

Summary of Tujunga Facility Operations:

<b>SUSPECTED OPERATOR/TENANT</b>	<b>APPROXIMATE TENANCY PERIOD</b>	<b>TYPE OF OPERATIONS</b>
<b>Suspected operators/tenants on property during CalMat's ownership:</b>		
A-1 Scrap, Inc. (Exhibits 109, 114, 116)	1978-1992	Unknown.
Champion Auto Parts	Unknown	Unknown

<b>SUSPECTED OPERATOR/TENANT</b>	<b>APPROXIMATE TENANCY PERIOD</b>	<b>TYPE OF OPERATIONS</b>
(Exhibit 115)		
EZ Auto (Exhibit 115)	Unknown	Unknown
Pick Your Part Auto Wrecking (Exhibit 112, 117)	1982-2002 (then became property owner)	Auto salvage use.
M&N Auto Parts (Exhibit 115)	Unknown	Unknown
<b>Suspected operators/tenants on property prior to CalMat's ownership:</b>		
Agop Berghoudian (Exhibit 114)	Unknown-1983	Unknown.
Crossroads Chevrolet (Exhibit 115)	Unknown	Unknown
Insurance Salvage Service (Exhibits 108, 110)	1979-Unknown	Unknown.
Sun Valley Pick Your Part Auto Wrecking (Exhibits 112, 117-120)	1979-Unknown	Auto salvage use.

25. Provide copies of all environmental data or technical or analytical information regarding soil, water, and air conditions at or adjacent to each of the Facilities, including, but not limited to, environmental data or technical or analytical information related to soil contamination, soil sampling, soil gas sampling, geology, water (ground and surface), hydrogeology, groundwater sampling, and air quality. In your response, include copies of supplemental monitoring report dated July 1, 1989, mentioned in the Solid Waste Assessment Test (SWAT) – Water for Hewitt Landfill dated June 6, 1988 prepared by Law Environmental for CalMat Company, and include a copy of the Appendix D to the SWAT report dated July 1, 1988, prepared by Law Environmental for CalMat Company.

The Company's 104(e) response indicates that a vadose zone monitoring system was installed at the Laurel Canyon facility in the 1980's, but provides no copies of monitoring reports or testing results. Provide copies of all testing and monitoring results conducted on the soil and soil gas at this facility.

***Responses:***

See attached Exhibit 80.